

**JOE RICHARD “TREY” POOL,
III, TRENTON DONN “TRENT”
POOL, ACCELEVATE2020, LLC,
LIBERTY INITIATIVE FUND, and
PAUL JACOB,**

CIVIL ACTION

No. 19-CV-2236

V.

Defendants.

Defendants, the City of Houston (“Houston”), and Pat J. Daniel, the City Secretary sued in her official capacity, (collectively “the City”), file this Motion for Leave to Exceed this Court’s Page Limit. In support of its Motion, the City states the following:

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3. Thereafter, this Court allowed Plaintiffs to amend their pleadings to add eight claims to the three they had previously asserted.

4. The City wishes to file its Amended Motion to Dismiss or, Alternatively, for Summary Judgment, directed to Plaintiffs' Second Amended Petition and Memorandum in support. The City's motion is two pages long and its Memorandum is forty pages long, excluding the table of contents and other organizational items this Court requires.

5. Plaintiffs' claims raise myriad constitutional issues, cloaked in excessive, over-heated rhetoric, that requires pain-staking analysis to reveal that they are utterly without merit. Consequently, it is important that the City's motion, which would dispose of all 11 claims, be thorough and present the Court with all pertinent issues. It would not be possible to do that in 20 pages, or less than 2 pages a claim.

6. Further, to adhere to the Court's rule would require Houston to completely rewrite the memorandum it had already filed, wasting precious resources.

7. Counsel for the City has contacted counsel for Plaintiffs who opposes anything more than 30 pages.

For the reasons stated herein, the City respectfully request that this Court grant Defendants' Motion for Leave to Exceed Page Limit, and allow Houston to file the attached motion and memorandum, and award to Houston or other relief as to which the Court finds it entitled.

Respectfully submitted,

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City Attorney

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*Attorneys for Defendants
City of Houston and Pat J. Daniel*

CERTIFICATE OF SERVICE

I certify that on May 25, 2021, a copy of the foregoing City's Motion to Dismiss or, Alternatively, Motion for Summary Judgment on Plaintiffs' Claims was served electronically on the CM/ECF system which will automatically serve an electronic notice on the following counsel of record for Plaintiffs:

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